



Socially Responsible Trading Code of Practice

Introduction

Rowlinson Garden Products Ltd operates in the United Kingdom and our buyers search the world to find new sources of supply to satisfy the needs of our customers.

Our aim is to build and maintain long term partnerships with suppliers by providing any commercial or technical help in a variety of areas.

As we broaden our supply base, especially towards suppliers in developing countries, we have become more conscious of the need to share in the responsibility for social development and for the welfare of employees who produce our products.

We have therefore set out certain principles, which underpin our trading relationships. In building partnerships with suppliers, we seek to work with those who share our values and are prepared to commit themselves to these principles.

Applying these principles to local circumstances takes time and requires sensitivity and understanding of their particular cultures and values. We desire to see the principles adopted as the normal way of working and not as an alternative or forced option and are committed to working towards continuous improvement.

1. The Principles

These principles have been developed by the company to set out clearly defined responsibilities we share with suppliers for certain social matters. Whilst they have a general application, the principles have been drafted with particular reference to our trade in developing countries. Supported by the Code of Practice, they are an expression of the social values that provide a basis for our trading relationship.

Our principles constitute minimum and not maximum standards and should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and where the provisions of law and this code address the same topic, to apply that provision which affords the greater protection.

1.1 Fair Trading

In the conduct of its business the company will deal openly and fairly with suppliers, adhere to

contract terms and avoid the exercise of undue pressure.

1.2 Protection of Children

Children may only be employed in circumstances, which fully safeguard them from potential exploitation, which protect them from moral or physical hazard and long term damage to health and which do not disrupt their education.

1.3 Health and Safety

Policies and procedures for health and safety will be established which are appropriate to the activities. In the absence of legal requirements these will reflect clear awareness of obvious hazards and general regard for the well being of all employees. Such policies and procedures will also apply to any living accommodation provided in association with employment.

1.4 Equal Opportunities

Whilst being sensitive to cultural differences the company will expect the development of equal opportunities in employment, without discrimination on race, religion and gender or any other arbitrary basis.

1.5 Freedom of Association

Employees shall be free to join lawful association; forced labour or coercion is not acceptable.

1.6 Remuneration

Pay will not be lower than that required by law, in the absence of law that paid generally within the industry. It will also have regard to what is needed to maintain family life above subsistence levels.

2.0 The Code of Practice

2.1 Application and Monitoring

This code of practice sets out how the Principles, which of necessity are described in general terms, are to be applied in the ordinary course of business by the company and its suppliers.

Rowlinson representatives will work positively with suppliers towards a general compliance with the Principles as amplified by the Code of practice. Monitoring of performance will be incorporated into the normal monitoring and review process carried out by the staff of Rowlinson and their representatives.

Availability of records and full access to premises and staff will be important in demonstrating

compliance. Suppliers who employ agents or subcontractors will be expected to take responsibility for these aspects of performance as they do for any other aspect of contract compliance.

Specific lapses in performance will be taken up as part of the normal control arrangements. Where it becomes apparent that the Principles and Code of Practice are not being achieved in substance, suppliers will be expected to work with company representatives or independently appointed assessment bodies to achieve an agreed standard. This will be done in a spirit of partnership but Rowlinson would not expect to continue trading with those companies that are unwilling to work towards such improvements. The observance of some of the principles of the code may not be immediately realisable in all cases. Some suppliers may not be able to meet all the terms within a short time or in some cases they may be constrained by national law. Reasonable timeframes and the existence of any constraints not controllable by the suppliers may be taken account of.

2.2 Fair Trading

Clear terms and conditions will be agreed at the commencement of each contract. These will include product specification and payment terms. Suppliers will have to respond to the highly competitive environments in which Rowlinson and themselves trade and Rowlinson will not make undue use of their current market share to bring unfair pressure on suppliers. The importance of complying with product safety standards must be understood and implemented.

2.3 Protection of Children

Special care is needed in the employment of children. Where children are employed due consideration must be given to their age, the hours worked, rates of pay, safety and impact on their education. The International Labour organisation (ILO) Conventions on child employment should be standard.

There shall be no recruitment of child labour and the Company does not employ any person under the age of 18.

Establishing a child's age may be difficult where there is no legal system of verification; the employer has responsibility to make proper enquiry into the child's age and to maintain a record.

Where children are employed the employer must comply with all applicable child labour law including those relating to schooling, hiring, wages, hours worked, overtime and working and welfare conditions.

It is expected that the employer will encourage eligible younger workers to attend classes or participate in work study or other government sponsored educational programmes.

Where it is traditional for whole families to work, the nature of the work undertaken by children must be clearly understood and appropriate to their age.

Children must not be allowed to work at night.

2.4 Health and Safety

General

Employees are expected to provide a safe working environment and ensure that the local laws relating to health and safety in the workplace are adhered to. If living accommodation and facilities are provided health and safety requirements apply equally to these. Furthermore, employee representatives should be involved in the development of standards appropriate to the workplace.

Factories

These must comply with all relevant national laws relating to working conditions including health and safety, sanitation, fire safety and electrical, mechanical and structural safety.

There must be sufficient ventilation and light. This could include windows, fans, air conditioners or heaters, as appropriate, in order to provide adequate ventilation, circulation and temperature control to all areas.

Machinery should be well maintained, inspected and equipped with the relevant operational safety devices.

Employees should be trained in the use of personal safety equipment; essential equipment should be available free of charge.

Fire safety: attention should be given to the following

Fitting fire alarms to each floor with emergency lighting above exits and stairways.

Accessibility of aisles and clearly marked emergency exits which should be unlocked during working hours and free from debris.

Ready availability of fire extinguishers and other appropriate fire fighting equipment, which should be easily accessible and regularly maintained.

Evidence that evacuation drills are conducted.

Hazardous and combustible materials must be stored securely, in well ventilated areas and disposed of in a safe and legal manner

Health

Employees should have reasonable access to potable water throughout the day.

Every factory floor should be provided with one well stocked first aid kit.

Procedures to deal with serious injuries requiring medical attention must be in place.

Sufficient clean and sanitary toilet areas, with no unreasonable restrictions on their use, must be in place.

Accommodation

Accommodation or dormitory facilities provided for staff must be kept clean and safe, maintained in a good condition and meet all relevant health and safety regulations and the local industry standard.

There should be sufficient space for sleeping and toilets to allow segregation by gender or family group.

Potable water should be provided or facilities to boil water should be accessible.

Mats and beds and personal storage areas for clothing and personal possessions should be available for each employee.

Facilities must have adequate lighting, be well ventilated and, as appropriate, have windows to the outside, air conditioners and/or heaters in all sleeping areas to provide adequate circulation, ventilation and temperature control; there will be proper fire precautions in line with safety standards.

Dormitory residents must have freedom of movement during their off-work hours (subject to limitations imposed for their safety and comfort).

2.5 Equal Opportunities

In applying the general principle full account must be taken of cultural and other factors in the country concerned.

People with similar skills should receive equal treatment

There should be no discrimination in relation to access to jobs or training.

2.6 Freedom of Association

Employees must be free within the law to join unions or associations of their choosing without fear of intimidation or discrimination.

Employer should not use any forced labour.

Employers shall not engage in or permit physical acts to punish or coerce employees; neither will the employer allow psychological coercion or any other form of non-physical abuse.

2.7 Remuneration

Hours of Work and Wages

Working hours, wages, overtime pay and holiday entitlements should be set in compliance with all applicable laws pertaining, not only to the country, but also to each industry sector.

Normal working hours should not exceed those recommended by ILO standards (a maximum of 48 hours per week with up to 12 hours of occasional overtime,)

Wages should be paid promptly in cash, cheque or direct to the workers bank or other mutually agreed method, which does not use company tokens.

The employer should provide employees with an understandable statement of their remuneration and retain records of payment.

Employers should not avoid their legal obligations to employees through the unjustified use of temporary contracts or insistence on self employed status.

2.8 Overtime

It is accepted that overtime is often required in a variety of industry sectors. Overtime should not be excessive; where it is necessary the rate of pay or incentive rates must meet all legal requirements or higher local industry standard.

2.9 Time Off/Holiday Entitlement

Employees should have on average at least one day off in seven.

Employers should provide paid annual leave and holidays as required by law or higher local industry standard.

C. D. Firth

Mr. C. D. Firth

Managing Director

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